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\*NOT ADMITTED TO THE NEW YORK BAR

June 13, 2014

**By Hand**

The Honorable Thomas P. Griesa  
Daniel Patrick Moynihan United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

*Allianz Risk Transfer AG, et al. v. Paramount Pictures Corporation,*  
No. 08-CV-10420 (TPG)

Dear Judge Griesa:

This firm represents defendant Paramount Pictures Corporation ("Paramount") in the above matter. We write to request a brief, one-week extension to the summary judgment briefing schedule set out in the Court's June 10, 2014 order (the "June 10 Order"), so that Paramount's reply papers will be due on Friday, July 25, 2014, rather than on July 18, 2014. As noted below, our request is primarily motivated by the new schedule for expert depositions that we suspect Your Honor may have been unaware of at the time of Your Honor's June 10 Order.

In making this request, Paramount is mindful of that portion of the June 10 Order specifying that no further extensions will be granted. Nonetheless, as we explain in the enclosed letter (which we submitted to the Court yesterday) (Docket # 91), on June 6, 2014, at plaintiffs' insistence, the parties held an emergency telephonic conference before the Part I Judge, Judge Keenan. As a result of that conference, four of the expert

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The Honorable Thomas P. Griesa

2

depositions in this matter were moved to the week of July 14-18. At the moment, under the June 10 Order, Paramount's reply papers are due on June 18, the end of that same week.

Accordingly, if its reply papers are due on July 18, Paramount would be required to prepare those papers over a two-week period starting July 3 (and therefore including the July 4 holiday weekend), while simultaneously preparing for, taking and defending four expert depositions. In addition, two of the attorneys working on this matter at our co-counsel, Kendall, Brill & Klieger, are scheduled to be on trial the week of July 14-18.

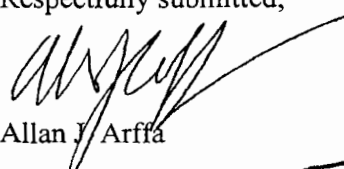
A short, one-week extension of the time for our reply papers would alleviate all of these burdens.

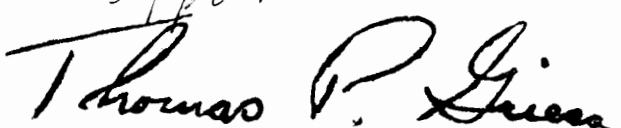
Particularly given that defendants will be taking 10 weeks to respond to Paramount's initial motion papers, we believe this brief extension of Paramount's reply time will not cause any prejudice to the parties or to the overall schedule of this action. We have made no prior request for an adjournment of the date for our reply papers set forth in the June 10 Order.

We requested plaintiffs' consent to this proposed adjournment. Rather than responding directly to us, plaintiffs apparently delivered late yesterday (June 12) a letter to Your Honor. We see no need to respond in detail to the various inflammatory and inaccurate statements in that letter. Instead, we note that the bulk of that letter is spent attempting (unsuccessfully, in our view) to justify plaintiffs' belated creation of new expert damages analyses after their initial damages analysis was revealed to be fatally flawed. The only relevant point is that, despite all of their ramblings, plaintiffs ultimately state that they do *not* oppose Paramount's request for an extension.

So raised. [ For the reasons set forth above, Paramount respectfully requests a short, one-week extension until July 25 of its time to serve its reply papers on its summary judgment motion.

Respectfully submitted,

  
Allan J. Arffa

*Approved.*  
  
June 30, 2014

cc: All counsel of record (by email)

**MEMO ENDORSED**